

EXHIBIT E

Exhibit: 1

Volume 1, Pages 1-110

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SIOBHAN WALSH,

Plaintiff

v.

Docket No. 1:13-cv-13064-RWZ

TELTECH SYSTEMS, INC.,

Defendant

DEPOSITION OF JOHNIENNE DiLORENZO

Wednesday, October 22, 2014, 1:07 p.m.

O'Connor, Carnathan and Mack LLC

Landmark One, 1 Van de Graaff Drive, Suite 104

Burlington, Massachusetts

----Reporter: Janis T. Young, RDR/CRR----
jty@fabreporters.com www.fabreporters.com

Farmer Arsenault Brock LLC
50 Congress Street, Suite 350
Boston, Massachusetts 02109
617.728.4404

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

3

<p style="text-align: right;">6</p> <p>1 question.</p> <p>2 A. Okay.</p> <p>3 Q. Do you have any questions about the process</p> <p>4 before we begin?</p> <p>5 A. No.</p> <p>6 MR. CALANDRELLI: And we've agreed that</p> <p>7 all objections except to the form of the question</p> <p>8 will be reserved to the time of trial?</p> <p>9 MR. CARP: Yes.</p> <p>10 MR. CALANDRELLI: 30 days to read and</p> <p>11 sign?</p> <p>12 MR. CARP: Yes.</p> <p>13 MR. CALANDRELLI: Waive the notary?</p> <p>14 MR. CARP: Yes.</p> <p>15 Q. Mrs. DiLorenzo, I'm placing in front of you</p> <p>16 what has been marked as Exhibit 1. Take a minute to</p> <p>17 review that, if you will, please.</p> <p>18 (Pause)</p> <p>19 Q. Do you recognize this document?</p> <p>20 A. I do.</p> <p>21 Q. This is the subpoena that you received</p> <p>22 requiring your attendance at today's deposition?</p> <p>23 A. Yes.</p> <p>24 Q. Do you see the category of documents that</p>	<p style="text-align: right;">8</p> <p>1 Q. What year did you graduate?</p> <p>2 A. 1995.</p> <p>3 Q. Did you attend any collegiate schooling?</p> <p>4 A. No.</p> <p>5 Q. What do you do for work?</p> <p>6 A. I am a veterinary assistant.</p> <p>7 Q. Where?</p> <p>8 A. At West Roxbury Animal Hospital in West</p> <p>9 Roxbury, Massachusetts.</p> <p>10 Q. How long have you held that position for?</p> <p>11 A. Four or five years.</p> <p>12 Q. Did you work at the West Roxbury Animal</p> <p>13 Hospital in 2009?</p> <p>14 A. No.</p> <p>15 Q. Where did you work in 2009?</p> <p>16 A. Oh. Yeah, I got the job in 2009.</p> <p>17 Q. Do you recall when in 2009?</p> <p>18 A. No.</p> <p>19 Q. What did you do for work before getting the</p> <p>20 job at the animal hospital?</p> <p>21 A. Before when?</p> <p>22 Q. Before you got the job at the animal</p> <p>23 hospital.</p> <p>24 A. I did some waitressing, and before that I</p>
<p style="text-align: right;">7</p> <p>1 were requested on the fourth page of this exhibit?</p> <p>2 A. Yes.</p> <p>3 Q. What did you do, if anything, to search for</p> <p>4 any of the documents that are requested in this</p> <p>5 list?</p> <p>6 A. Communicated the list to my attorney.</p> <p>7 I mean, I don't have any of this.</p> <p>8 Q. And by your attorney, you're referring to</p> <p>9 Attorney Carp?</p> <p>10 A. Yes, I am.</p> <p>11 Q. Did you actually do anything to determine</p> <p>12 whether you had any of these documents?</p> <p>13 A. No. I spoke to my attorney.</p> <p>14 Q. For example, you didn't search any emails</p> <p>15 to determine whether you had any communications that</p> <p>16 were requested as part of this subpoena?</p> <p>17 A. I know I don't have them in my possession.</p> <p>18 Q. So you didn't actually search to see if you</p> <p>19 had anything you'd forgotten about?</p> <p>20 A. No.</p> <p>21 Q. Did you go to high school?</p> <p>22 A. Yes.</p> <p>23 Q. Where?</p> <p>24 A. Boston Latin Academy.</p>	<p style="text-align: right;">9</p> <p>1 was in real estate.</p> <p>2 Q. Where did you waitress?</p> <p>3 A. At a breakfast place in Quincy,</p> <p>4 Massachusetts.</p> <p>5 Q. What was the name of it?</p> <p>6 A. I forget the name.</p> <p>7 Q. When did you work at this breakfast place?</p> <p>8 A. In 2008, 2009. I can't quite remember.</p> <p>9 Q. Did John Luciano work at this restaurant?</p> <p>10 A. Yes, he did.</p> <p>11 Q. What was his position?</p> <p>12 A. Chef.</p> <p>13 Q. What was the address of the restaurant?</p> <p>14 A. I don't know.</p> <p>15 Q. Do you recall what street it was on?</p> <p>16 A. No.</p> <p>17 Q. How did you get the job?</p> <p>18 A. Through John Luciano.</p> <p>19 Q. Prior to working with him, did you know who</p> <p>20 Mr. Luciano was?</p> <p>21 A. Vaguely.</p> <p>22 Q. Who was he, to your knowledge?</p> <p>23 A. He grew up in Dedham.</p> <p>24 Q. Was he friends with your husband?</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

4

<p style="text-align: right;">10</p> <p>1 A. Not really friends; acquaintances.</p> <p>2 Q. Did John Luciano attend your wedding?</p> <p>3 A. I don't think so, no.</p> <p>4 Q. Was he invited?</p> <p>5 A. No.</p> <p>6 Q. How well did you know John Luciano before</p> <p>7 working with him at this breakfast place?</p> <p>8 A. I'd say not at all, not really.</p> <p>9 Q. Had you ever been to his apartment?</p> <p>10 A. No.</p> <p>11 Q. Do you know where he lived?</p> <p>12 A. Before all of this happened?</p> <p>13 Q. Sure.</p> <p>14 A. No.</p> <p>15 Q. You understand that you're here to testify</p> <p>16 in connection with certain telephone calls that were</p> <p>17 made to a woman by the name of Siobhan Walsh in</p> <p>18 January and February of 2009; right?</p> <p>19 A. I understand that.</p> <p>20 Q. Using that time period as context, January</p> <p>21 and February of 2009, had you already been working</p> <p>22 at this breakfast place with John Luciano at that</p> <p>23 time?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">12</p> <p>1 A. It had become uncomfortable.</p> <p>2 Q. Why?</p> <p>3 A. Because of John Luciano.</p> <p>4 Q. What was he doing to cause it to become</p> <p>5 uncomfortable?</p> <p>6 A. Being very inappropriate as a boss and a</p> <p>7 coworker.</p> <p>8 Q. In what ways was he being inappropriate?</p> <p>9 A. Making advances that were unwanted.</p> <p>10 Q. Did these occur during work?</p> <p>11 A. Yes.</p> <p>12 Q. Did they occur outside of work?</p> <p>13 A. Yes.</p> <p>14 Q. In what capacity outside of work?</p> <p>15 A. He would call me.</p> <p>16 Q. Would you speak with him?</p> <p>17 A. Most of the time, no.</p> <p>18 Q. Would he leave messages?</p> <p>19 A. Yes.</p> <p>20 Q. What did he say on his messages?</p> <p>21 A. I don't recall a lot of what was said.</p> <p>22 Q. What was the general nature of what he</p> <p>23 would say on his messages?</p> <p>24 A. The general nature? Advances, like I said.</p>
<p style="text-align: right;">11</p> <p>1 Q. Do you recall whether you first started</p> <p>2 working at that place in 2008?</p> <p>3 A. I'm sorry?</p> <p>4 Q. Well, the first calls I'm going to ask you</p> <p>5 about in a little while will have occurred on</p> <p>6 January 28 of 2009; okay?</p> <p>7 A. Okay.</p> <p>8 Q. Using that date as a reference, do you</p> <p>9 recall whether you first started working at this</p> <p>10 breakfast place previously in the month of January</p> <p>11 of 2009, or whether it was sometime before that?</p> <p>12 A. It was sometime before that.</p> <p>13 Q. So sometime in the year 2008?</p> <p>14 A. Yes.</p> <p>15 Q. By January 28 of 2009, were you still</p> <p>16 working at this breakfast place?</p> <p>17 A. I don't think so.</p> <p>18 Q. What were the circumstances under which you</p> <p>19 stopped working at this restaurant?</p> <p>20 A. I quit.</p> <p>21 Q. Why did you quit?</p> <p>22 A. Because I didn't want to work there</p> <p>23 anymore.</p> <p>24 Q. Why didn't you want to work there anymore?</p>	<p style="text-align: right;">13</p> <p>1 Q. Can you recall any more substance, other</p> <p>2 than advances?</p> <p>3 MR. CARP: Objection.</p> <p>4 Q. Again, if your attorney objects, you can</p> <p>5 still answer.</p> <p>6 A. I mean, obviously they were sexual; just</p> <p>7 things that made me very uncomfortable.</p> <p>8 Q. Other than making advances, did Mr. Luciano</p> <p>9 do anything else to cause you to quit working at the</p> <p>10 restaurant?</p> <p>11 A. Yes.</p> <p>12 Q. What else did he do?</p> <p>13 A. He was going by my house.</p> <p>14 Q. What do you mean when you say going by your</p> <p>15 house?</p> <p>16 A. In the middle of the night, driving by my</p> <p>17 house, getting out, looking in my windows.</p> <p>18 Q. How did you find out about that?</p> <p>19 A. I saw him. My neighbors saw it and brought</p> <p>20 it to my attention. It made them question what was</p> <p>21 going on.</p> <p>22 Q. How many times would you say that you</p> <p>23 personally saw Mr. Luciano drive by your apartment?</p> <p>24 A. That I personally saw?</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

9

<p style="text-align: right;">30</p> <p>1 Q. Was it more than two years?</p> <p>2 A. Yes.</p> <p>3 Q. Was it more than five years?</p> <p>4 A. I'm not sure.</p> <p>5 Q. Why were you desperate to find a job at</p> <p>6 that point?</p> <p>7 A. Because I had been out of work for so long.</p> <p>8 Q. Why had you been out of work?</p> <p>9 A. Because I was sick.</p> <p>10 Q. What were you sick from?</p> <p>11 A. I had a brain tumor that was affecting my</p> <p>12 health.</p> <p>13 Q. How long had you been out of work for,</p> <p>14 approximately?</p> <p>15 A. I think a couple of years, maybe even more.</p> <p>16 Q. Have you ever been arrested before?</p> <p>17 A. No.</p> <p>18 Q. Have you ever been charged criminally?</p> <p>19 A. I don't think so.</p> <p>20 Q. Do you know if Mr. Luciano had any type of</p> <p>21 relationship with Ms. Walsh other than her being his</p> <p>22 neighbor?</p> <p>23 MR. CARP: Objection.</p> <p>24 A. I don't know.</p>	<p style="text-align: right;">32</p> <p>1 Q. If you look to the second page of this</p> <p>2 document, please; and if you can just read that</p> <p>3 paragraph to yourself, please -- actually, the</p> <p>4 second and third paragraphs on that page -- and just</p> <p>5 let me know when you're done.</p> <p>6 (Pause)</p> <p>7 A. Okay.</p> <p>8 Q. You've had a chance to review the second</p> <p>9 and third paragraphs on Page 2 of Exhibit 2?</p> <p>10 A. I have.</p> <p>11 Q. Do you see that these paragraphs reference</p> <p>12 certain telephone calls that were reported to have</p> <p>13 been made to Ms. Walsh on January 28 of 2009?</p> <p>14 A. Yes.</p> <p>15 Q. Did you make these calls?</p> <p>16 A. I did.</p> <p>17 Q. Where were you when you made these calls?</p> <p>18 A. I don't remember.</p> <p>19 Q. Were you in your house?</p> <p>20 A. I don't remember.</p> <p>21 Q. Was your husband with you?</p> <p>22 A. I don't remember.</p> <p>23 Q. Why did you make these calls to Ms. Walsh?</p> <p>24 A. I'd like to plead the Fifth.</p>
<p style="text-align: right;">31</p> <p>1 Q. I'm placing in front of you what has been</p> <p>2 previously marked as Exhibit 2 to Mr. DiLorenzo's</p> <p>3 deposition. Take a minute to review that, if you</p> <p>4 will, please. Your attorney already has a copy, so</p> <p>5 that's for you.</p> <p>6 (Pause)</p> <p>7 Q. You can either read that whole thing or</p> <p>8 just skim it; just let me know when you're ready to</p> <p>9 answer some questions.</p> <p>10 And I should add, Mrs. DiLorenzo, if I</p> <p>11 ask a question and after I've asked the question it</p> <p>12 would help you to review the document, just let me</p> <p>13 know and you're free to do that; okay?</p> <p>14 A. Okay.</p> <p>15 Q. Have you ever before seen the document</p> <p>16 that's been marked as Exhibit 2 before?</p> <p>17 A. I can't remember.</p> <p>18 Q. Have you seen certain police reports</p> <p>19 arising from telephone calls that were made to</p> <p>20 Ms. Walsh in January of 2009?</p> <p>21 A. I'm sure I have, but I don't remember them.</p> <p>22 Q. You don't remember whether you've ever seen</p> <p>23 this particular police report?</p> <p>24 A. I don't remember.</p>	<p style="text-align: right;">33</p> <p>1 Q. You've already told me you've made the</p> <p>2 calls. Are you going to plead the Fifth as to why</p> <p>3 you made the calls?</p> <p>4 MR. CARP: Objection.</p> <p>5 MR. CALANDRELLI: I'm asking for</p> <p>6 clarification.</p> <p>7 A. I would like to plead the Fifth.</p> <p>8 Q. How was it that you came to know</p> <p>9 Ms. Walsh's telephone number?</p> <p>10 A. I don't remember.</p> <p>11 Q. Did Mr. Luciano provide you with the</p> <p>12 telephone number?</p> <p>13 A. I don't remember.</p> <p>14 Q. *How did you decide that it was going to be</p> <p>15 Ms. Walsh who received these calls, as opposed to</p> <p>16 anybody else?</p> <p>17 A. Would you mind if I took a moment to go to</p> <p>18 the bathroom?</p> <p>19 Q. I'd ask that you answer this question, and</p> <p>20 then we can take a break.</p> <p>21 A. Okay; could you repeat the question?</p> <p>22 Q. Sure.</p> <p>23 MR. CALANDRELLI: Could you read back</p> <p>24 the question, please?</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

10

<p style="text-align: right;">34</p> <p>1 (*Question read)</p> <p>2 A. I don't remember.</p> <p>3 Q. If you would like to take a break?</p> <p>4 A. I would, yes, please.</p> <p>5 (Recess)</p> <p>6 Q. Are you all set?</p> <p>7 A. Thank you.</p> <p>8 Q. What telephone did you use to make these</p> <p>9 calls to Ms. Walsh?</p> <p>10 A. I don't remember.</p> <p>11 Q. Did you use any service to assist you in</p> <p>12 making these telephone calls?</p> <p>13 MR. CARP: Objection.</p> <p>14 A. SpoofCard. It's obvious.</p> <p>15 Q. So you used the SpoofCard?</p> <p>16 A. Yes.</p> <p>17 Q. Did you own a SpoofCard at that point?</p> <p>18 A. I'm not sure. I don't remember.</p> <p>19 Q. How did you first come to learn of the</p> <p>20 SpoofCard product?</p> <p>21 A. I can't remember exactly. I know I was</p> <p>22 with a bunch of people, either at a bar or a party</p> <p>23 situation.</p> <p>24 Q. Do you remember anybody whom you were with</p>	<p style="text-align: right;">36</p> <p>1 Q. Prior to that time, you had never seen any</p> <p>2 advertisements for SpoofCard?</p> <p>3 A. No.</p> <p>4 Q. You had never seen any promotional</p> <p>5 materials for SpoofCard?</p> <p>6 A. No.</p> <p>7 Q. Do you recall when it was that you were at</p> <p>8 this gathering when you learned of SpoofCard?</p> <p>9 A. I don't recall.</p> <p>10 Q. Do you know if it was close in time to</p> <p>11 January 28, 2009?</p> <p>12 A. I believe it was, but I can't exactly</p> <p>13 remember.</p> <p>14 Q. To your knowledge, did your husband know of</p> <p>15 SpoofCard prior to you first hearing about it at the</p> <p>16 social gathering?</p> <p>17 A. I do not think so.</p> <p>18 Q. Did you inform your husband of the</p> <p>19 SpoofCard product after you learned of it?</p> <p>20 A. I believe I did.</p> <p>21 Q. Do you recall what you informed him about</p> <p>22 it?</p> <p>23 A. I don't recall exactly what I said.</p> <p>24 Q. Do you recall whether you or he</p>
<p style="text-align: right;">35</p> <p>1 that mentioned the SpoofCard to you?</p> <p>2 A. Not in particular, no.</p> <p>3 Q. And what was said to you about what the</p> <p>4 SpoofCard product is?</p> <p>5 A. It wasn't said directly to me; it was like</p> <p>6 at a party. People were showing it around and</p> <p>7 thought it was interesting.</p> <p>8 Q. And to the best of your memory, what did</p> <p>9 you hear that was said about the product wherever</p> <p>10 you were when you first learned of it?</p> <p>11 A. All you have to go is go onto spoofcard.com</p> <p>12 and you can change your phone number, change your</p> <p>13 caller ID.</p> <p>14 Q. Do you recall hearing anything else?</p> <p>15 A. Not really. I don't recall.</p> <p>16 Q. When you said people were showing it</p> <p>17 around, what do you mean?</p> <p>18 A. Like calling each other using it.</p> <p>19 Q. And you were at some sort of social</p> <p>20 gathering when you saw this?</p> <p>21 A. Yeah. I can't remember exactly, but yeah.</p> <p>22 Q. And this was the first time you had heard</p> <p>23 of SpoofCard?</p> <p>24 A. As far as I know, yes.</p>	<p style="text-align: right;">37</p> <p>1 subsequently purchased SpoofCard minutes?</p> <p>2 A. I don't recall.</p> <p>3 Q. Do you recall ever accessing the SpoofCard</p> <p>4 website in order to purchase minutes for SpoofCard?</p> <p>5 A. I don't remember exactly; exactly.</p> <p>6 Q. And if I understand this police report</p> <p>7 correctly, you used the SpoofCard in order to make</p> <p>8 the calls you made to Ms. Walsh appear as if they</p> <p>9 were coming from a telephone number owned by the</p> <p>10 Lucianos; is that correct?</p> <p>11 A. That's what it says here, yes.</p> <p>12 Q. Is that what happened?</p> <p>13 A. I don't recall. I don't remember.</p> <p>14 Q. Did you have any conversation with your</p> <p>15 husband about making these calls before you made</p> <p>16 them?</p> <p>17 A. Before I made them?</p> <p>18 Q. Correct.</p> <p>19 A. No. But I don't remember.</p> <p>20 Q. How did you decide to make the calls appear</p> <p>21 as if they were coming from the Lucianos?</p> <p>22 MR. CARP: Objection.</p> <p>23 A. Can you repeat the question? I don't</p> <p>24 understand if I understand it exactly.</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

11

<p style="text-align: right;">38</p> <p>1 Q. Sure. The reason you used the SpoofCard</p> <p>2 was to make those calls to Ms. Walsh appear as if</p> <p>3 they were coming from someone else; correct?</p> <p>4 A. I guess, yeah.</p> <p>5 Q. You don't have to agree with me; I'm just</p> <p>6 asking for your knowledge.</p> <p>7 A. I don't remember.</p> <p>8 Q. All right. Were you upset with Mr. Luciano</p> <p>9 in January of 2009?</p> <p>10 A. I was scared of him.</p> <p>11 Q. And this was because of the advances that</p> <p>12 he had made on you?</p> <p>13 A. Yes.</p> <p>14 Q. And because of --</p> <p>15 A. And coming by my house, yes.</p> <p>16 Q. Any other reasons you were scared of him at</p> <p>17 this time?</p> <p>18 A. I thought that he had a drug problem, and</p> <p>19 that was just another reason I was scared.</p> <p>20 Q. What made you think he had a drug problem?</p> <p>21 A. When I worked with him, I knew that he</p> <p>22 would do drugs at work; and he had offered drugs to</p> <p>23 me at work.</p> <p>24 Q. What types of drugs did you witness</p>	<p style="text-align: right;">40</p> <p>1 A. No.</p> <p>2 Q. Did anybody associated with the SpoofCard</p> <p>3 product ever encourage or otherwise suggest to you</p> <p>4 that you should use the SpoofCard for a criminal</p> <p>5 purpose?</p> <p>6 A. I don't think so.</p> <p>7 Q. Did you at any time ever see any</p> <p>8 advertisements or other promotional materials</p> <p>9 associated with the SpoofCard product that suggested</p> <p>10 or otherwise encouraged you to use the SpoofCard</p> <p>11 product to harass somebody?</p> <p>12 A. No, I've never seen that.</p> <p>13 Q. Did you ever at any time see any</p> <p>14 advertisements or other promotional materials</p> <p>15 associated with the SpoofCard product that suggested</p> <p>16 or otherwise encouraged you to use the SpoofCard for</p> <p>17 a criminal purpose?</p> <p>18 A. No.</p> <p>19 Q. Prior to and including January 28, 2009, do</p> <p>20 you recall any instances where you personally</p> <p>21 accessed the SpoofCard website?</p> <p>22 A. I don't remember.</p> <p>23 Q. So then, is it fair to say that you don't</p> <p>24 recall any content that appeared on the SpoofCard</p>
<p style="text-align: right;">39</p> <p>1 Mr. Luciano using?</p> <p>2 A. Snorting cocaine.</p> <p>3 Q. Is that the same drug that he offered to</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. Any other reasons you thought Mr. Luciano</p> <p>7 had a drug problem?</p> <p>8 MR. CARP: Objection.</p> <p>9 A. It's just my opinion. So no, I don't know.</p> <p>10 Q. Did you intend to scare Ms. Walsh when you</p> <p>11 made the calls on January 28?</p> <p>12 A. I don't remember.</p> <p>13 Q. Did you intend to harass her?</p> <p>14 A. I don't remember.</p> <p>15 Q. Had you ever heard the name TelTech Systems</p> <p>16 prior to January 28 of 2009?</p> <p>17 A. No.</p> <p>18 Q. Did anybody associated with the SpoofCard</p> <p>19 product ever encourage or otherwise suggest to you</p> <p>20 that you should make these calls to Ms. Walsh?</p> <p>21 A. No.</p> <p>22 Q. Did anybody from or associated with the</p> <p>23 SpoofCard product ever suggest or otherwise</p> <p>24 encourage you to use the card to harass anybody?</p>	<p style="text-align: right;">41</p> <p>1 website?</p> <p>2 A. That is fair to say, yes.</p> <p>3 Q. And it's also fair to say that you don't</p> <p>4 recall any content that was not on the SpoofCard</p> <p>5 website?</p> <p>6 A. That is fair to say, yes.</p> <p>7 Q. Did you know at the time that you made</p> <p>8 these calls on January 28 that Mr. Luciano had a</p> <p>9 criminal record?</p> <p>10 A. Yes.</p> <p>11 Q. Did you know that he had outstanding</p> <p>12 warrants?</p> <p>13 A. No, I did not.</p> <p>14 Q. Did you intend for Mr. Luciano to be</p> <p>15 arrested as a result of these calls?</p> <p>16 A. No, I did not.</p> <p>17 Q. If you look at Exhibit 2, the second</p> <p>18 paragraph that you've already read --</p> <p>19 A. Yes.</p> <p>20 Q. -- if you look about two-thirds of the way</p> <p>21 down that paragraph, do you see a sentence that</p> <p>22 says, "When Walsh asked Luciano what he wanted, he</p> <p>23 stated the following, 'Meet me in the laundry room.</p> <p>24 I can't wait to fuck you up the ass so hard. I know</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

12

<p style="text-align: right;">42</p> <p>1 what you like.'" Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Did you make that statement on the</p> <p>4 telephone?</p> <p>5 MR. CARP: Objection.</p> <p>6 A. I don't remember.</p> <p>7 Q. What caused you to make that statement?</p> <p>8 MR. CARP: Objection.</p> <p>9 A. I really don't remember.</p> <p>10 Q. Did anybody associated with the SpoofCard</p> <p>11 product ever suggest or otherwise encourage you to</p> <p>12 make a statement such as that to Ms. Walsh?</p> <p>13 A. No.</p> <p>14 Q. Or to anybody else?</p> <p>15 A. No.</p> <p>16 Q. I'm placing now what's been marked</p> <p>17 previously as Exhibit 3 to Mr. DiLorenzo's</p> <p>18 deposition. I'd just ask you to take a minute to</p> <p>19 review that, if you will, please.</p> <p>20 (Pause)</p> <p>21 A. Okay.</p> <p>22 Q. If you look at the second page of this</p> <p>23 exhibit, do you see the first full paragraph, that</p> <p>24 begins "On February 2 of 2000"?</p>	<p style="text-align: right;">44</p> <p>1 2009?</p> <p>2 A. That is correct.</p> <p>3 Q. It's also fair to say that you don't have</p> <p>4 any knowledge of your husband using a SpoofCard --</p> <p>5 MR. CARP: Objection.</p> <p>6 Q. -- to make telephone calls to Ms. Walsh on</p> <p>7 February 2, 2009; is that correct?</p> <p>8 A. That is correct.</p> <p>9 Q. Have you had occasion to speak with</p> <p>10 Mr. Luciano at any time after you quit your job at</p> <p>11 the restaurant?</p> <p>12 A. I don't remember.</p> <p>13 Q. You don't have any memory of speaking with</p> <p>14 him after that time?</p> <p>15 A. Like forevermore after?</p> <p>16 Q. Well, at some point before January 28,</p> <p>17 2009, you stopped working at the restaurant;</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. Because Mr. Luciano made you feel</p> <p>21 uncomfortable?</p> <p>22 A. Yes.</p> <p>23 Q. Any time since that date, have you spoken</p> <p>24 with Mr. Luciano?</p>
<p style="text-align: right;">43</p> <p>1 A. Yes.</p> <p>2 Q. Can you just take a minute to review that</p> <p>3 paragraph to yourself, and let me know when you're</p> <p>4 finished?</p> <p>5 (Pause)</p> <p>6 A. Okay.</p> <p>7 Q. Do you see this paragraph references a</p> <p>8 series of voicemails that Ms. Walsh reported to the</p> <p>9 police that she received on February 2 of 2009?</p> <p>10 A. Yes, I see that.</p> <p>11 Q. Did you make any of these calls on February</p> <p>12 2, 2009 to Ms. Walsh?</p> <p>13 MR. CARP: Objection.</p> <p>14 A. I don't think so. I don't remember,</p> <p>15 though.</p> <p>16 Q. Do you know if your husband made these</p> <p>17 calls?</p> <p>18 A. I don't know.</p> <p>19 Q. Did you ever ask him whether he made those</p> <p>20 calls?</p> <p>21 A. No.</p> <p>22 Q. So if you don't recall making these calls,</p> <p>23 is it fair to say you don't recall using a SpoofCard</p> <p>24 to make any calls to Ms. Walsh on February 2 of</p>	<p style="text-align: right;">45</p> <p>1 A. Yes.</p> <p>2 Q. When?</p> <p>3 A. When we were in court, in Quincy Court.</p> <p>4 I should say, he spoke to me while we were in the</p> <p>5 waiting room.</p> <p>6 Q. This is when you were in Quincy District</p> <p>7 Court?</p> <p>8 A. Yes.</p> <p>9 Q. Was this in connection with criminal</p> <p>10 charges that had been asserted against your husband?</p> <p>11 A. Correct, yes.</p> <p>12 Q. And what did Mr. Luciano say to you?</p> <p>13 A. I don't remember exactly what he said. He</p> <p>14 talked nonstop.</p> <p>15 Q. Was this directed at you, or was it</p> <p>16 directed at someone in addition to you?</p> <p>17 A. Myself and my husband.</p> <p>18 Q. Do you recall anything that he said?</p> <p>19 A. Yes. I recall one thing. He called me a</p> <p>20 pig.</p> <p>21 Q. Do you recall anything else?</p> <p>22 A. Not really. I could not quote him, no.</p> <p>23 Q. Did you say anything to him during this</p> <p>24 time at the courthouse?</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

15

<p style="text-align: right;">54</p> <p>1 one more time?</p> <p>2 Q. Sure. You agree with me that what I've</p> <p>3 read is what the report reflects you said --</p> <p>4 A. Yes.</p> <p>5 Q. -- but you say you don't have a memory of</p> <p>6 actually saying that; correct?</p> <p>7 A. Correct.</p> <p>8 Q. So all I'm asking you is, do you have any</p> <p>9 reason to believe that you didn't actually say this</p> <p>10 to Detective Willard?</p> <p>11 A. No, there's no reason; no, I guess not.</p> <p>12 Q. You just don't recall doing it?</p> <p>13 A. I don't.</p> <p>14 Q. The next sentence says, "Johnienne also</p> <p>15 said that the calls were not meant to threaten or</p> <p>16 intimidate Siobhan in the case against Luciano." Do</p> <p>17 you see that?</p> <p>18 A. Yes, I see it.</p> <p>19 Q. Did you inform Detective Willard of that?</p> <p>20 A. That's what it says I said.</p> <p>21 Q. You don't recall?</p> <p>22 A. I don't.</p> <p>23 Q. Do you have any reason to believe that you</p> <p>24 didn't say that?</p>	<p style="text-align: right;">56</p> <p>1 she didn't know how far it went."</p> <p>2 Did you believe that John Luciano and</p> <p>3 Siobhan Walsh had some sort of relationship in 2009?</p> <p>4 MR. CARP: Objection.</p> <p>5 A. I don't know what I believed then. I don't</p> <p>6 remember.</p> <p>7 Q. Do you have any reason to believe that you</p> <p>8 didn't say this to Detective Willard?</p> <p>9 A. No.</p> <p>10 Q. Do you have any knowledge of John Luciano</p> <p>11 using a SpoofCard to make any telephone calls to you</p> <p>12 or your husband?</p> <p>13 MR. CARP: Objection.</p> <p>14 A. I'm sorry?</p> <p>15 Q. Do you have any knowledge of John Luciano</p> <p>16 using a SpoofCard to make any telephone calls to you</p> <p>17 or your husband?</p> <p>18 A. I don't know.</p> <p>19 Q. Were you aware that Mr. Luciano was</p> <p>20 arrested as a result of the telephone calls that you</p> <p>21 made to Ms. Walsh?</p> <p>22 A. I now know that happened, yes.</p> <p>23 Q. How did you find out that that had</p> <p>24 happened?</p>
<p style="text-align: right;">55</p> <p>1 A. No.</p> <p>2 Q. The next sentence says "Johnienne said she</p> <p>3 wouldn't try to help Luciano in that way." Do you</p> <p>4 recall telling that to Detective Willard?</p> <p>5 A. I don't.</p> <p>6 Q. Do you have any reason to believe that you</p> <p>7 didn't say that?</p> <p>8 A. No.</p> <p>9 Q. If you look at Paragraph 9, beginning in</p> <p>10 the second sentence, it says "Johnienne said Siobhan</p> <p>11 involved herself by helping John Luciano to harass</p> <p>12 them. Johnienne said she believes Siobhan has</p> <p>13 driven John Luciano to their house a number of</p> <p>14 times. Johnienne said her neighbors have reported</p> <p>15 seeing a woman in car outside of their house that</p> <p>16 she believes was Siobhan."</p> <p>17 That refers to the incidents you've</p> <p>18 already told me about today; correct?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall informing Detective Willard</p> <p>21 of those incidents?</p> <p>22 A. I do not recall this.</p> <p>23 Q. The next sentence says "Johnienne said John</p> <p>24 and Siobhan have a relationship of some kind, but</p>	<p style="text-align: right;">57</p> <p>1 A. I don't remember exactly.</p> <p>2 Q. When did you find out that that had</p> <p>3 happened?</p> <p>4 A. Most likely when we got in trouble for it,</p> <p>5 when we had to go to court for it; but I don't</p> <p>6 remember exactly when.</p> <p>7 Q. I asked you about advertisements concerning</p> <p>8 the SpoofCard product before.</p> <p>9 A. Yes.</p> <p>10 Q. Have you ever read any customer</p> <p>11 testimonials associated with the SpoofCard product?</p> <p>12 A. I don't think so.</p> <p>13 Q. Have you ever seen any?</p> <p>14 A. I don't remember.</p> <p>15 Q. Have you personally paid any money to</p> <p>16 Ms. Walsh as a result of these telephone calls?</p> <p>17 A. Yes, I believe so.</p> <p>18 Q. How much have you paid?</p> <p>19 A. That, I don't know off the top of my head.</p> <p>20 Q. Was this money that you actually paid, or</p> <p>21 someone paid on your behalf?</p> <p>22 A. Someone paid on my behalf.</p> <p>23 Q. Are you referring to a payment made by</p> <p>24 Mr. DiLorenzo's parents?</p>

Johnienne DiLorenzo - Vol. 1 - 10/22/2014

18

<p style="text-align: right;">66</p> <p>1 you learn about the existence of the website?</p> <p>2 A. Yes.</p> <p>3 Q. And I believe that you answered this</p> <p>4 question, but let me just be thorough here. Do you</p> <p>5 recall anyone who you talked to at that gathering</p> <p>6 about the SpoofCard; the identity of that person?</p> <p>7 A. No, I don't.</p> <p>8 Q. Do you know if during the course of that</p> <p>9 gathering you heard any stories in regards to how</p> <p>10 any of the guests had utilized the SpoofCard</p> <p>11 previously?</p> <p>12 A. No.</p> <p>13 Q. Did you get an understanding from that</p> <p>14 gathering of how the SpoofCard could be used?</p> <p>15 A. I mean, it seems pretty simple to me.</p> <p>16 Q. What you learned at that gathering is that</p> <p>17 you could place a call and masquerade as someone</p> <p>18 else by using their personal identifying phone</p> <p>19 number; isn't that right?</p> <p>20 MR. CARP: Objection to the question as</p> <p>21 phrased.</p> <p>22 MR. CALANDRELLI: Objection.</p> <p>23 Q. You can go ahead and answer.</p> <p>24 A. Yes.</p>	<p style="text-align: right;">68</p> <p>1 A. I don't recall.</p> <p>2 Q. Was your husband likewise present at this</p> <p>3 party?</p> <p>4 A. I don't believe so.</p> <p>5 Q. What caused you to purchase a SpoofCard, do</p> <p>6 you recall?</p> <p>7 A. I don't recall.</p> <p>8 Q. Did you purchase a SpoofCard prior to your</p> <p>9 dispute with Mr. Luciano that you've testified to?</p> <p>10 A. Prior to the dispute?</p> <p>11 Q. Well, at a certain juncture you became</p> <p>12 angry with Mr. Luciano; correct?</p> <p>13 A. I became scared.</p> <p>14 Q. Prior to becoming scared of Mr. Luciano,</p> <p>15 did you purchase a SpoofCard?</p> <p>16 A. Yes. I hadn't had it for very long at all.</p> <p>17 Q. When did you become scared of Mr. Luciano?</p> <p>18 Was there a particular event?</p> <p>19 A. No.</p> <p>20 Q. Was it sometime in January of the year 2009</p> <p>21 that you became scared of Mr. Luciano?</p> <p>22 A. It was while I worked with him.</p> <p>23 Q. And when did you terminate your employment</p> <p>24 at the restaurant?</p>
<p style="text-align: right;">67</p> <p>1 Q. And you can do that without the permission</p> <p>2 of the person who the phone number belongs to; is</p> <p>3 that right?</p> <p>4 A. I believe so, yes.</p> <p>5 Q. And that was the whole idea, to be able to</p> <p>6 place a call, pretend to be someone else, and have</p> <p>7 the person who's answering the call think you're</p> <p>8 someone else; is that right?</p> <p>9 MR. CARP: Objection.</p> <p>10 MR. CALANDRELLI: Objection.</p> <p>11 A. The way it was presented to me at the</p> <p>12 party, gathering, whatever, was it was funny. The</p> <p>13 people thought it was funny; they were laughing.</p> <p>14 Q. And do you recall specifically any stories</p> <p>15 they told you that were making them laugh? Did they</p> <p>16 tell you how they used the card?</p> <p>17 A. No.</p> <p>18 Q. Do you recall the season of the year that</p> <p>19 that party took place in?</p> <p>20 A. I don't.</p> <p>21 Q. Do you recall the location of the party?</p> <p>22 A. No.</p> <p>23 Q. Do you recall whether it was in a private</p> <p>24 residence, or a public house of some kind?</p>	<p style="text-align: right;">69</p> <p>1 A. I can't remember exactly.</p> <p>2 Q. Was it sometime in January of year 2009?</p> <p>3 A. I can't remember.</p> <p>4 Q. Were you still employed at the restaurant</p> <p>5 when you placed the call to Ms. Walsh on January 28,</p> <p>6 year 2009?</p> <p>7 MR. CARP: Objection.</p> <p>8 A. I don't think so, no.</p> <p>9 Q. Do you recall being employed at the</p> <p>10 restaurant at any point during year 2009?</p> <p>11 A. I don't recall.</p> <p>12 Q. Do you recall purchasing a SpoofCard at any</p> <p>13 time during year 2008?</p> <p>14 A. I don't remember.</p> <p>15 Q. I'm going to show you a document that's</p> <p>16 been previously marked as Exhibit 7 and specifically</p> <p>17 refer your attention to the first page of this</p> <p>18 document. At the top of the page, right next to the</p> <p>19 words "Call Logs," there's a number. Do you see</p> <p>20 that?</p> <p>21 A. Yes.</p> <p>22 Q. 700181415?</p> <p>23 A. Yes.</p> <p>24 Q. I'll represent to you that this document</p>